

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. <u>09-</u></b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>PETER EDWARD ALESZCZYK,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a “Peter Alex”</b>	<b>:</b>	<b>18 U.S.C. § 1343 (wire fraud - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1341 (mail fraud - 1 count)</b>

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times relevant to this information:

1. Defendant PETER EDWARD ALESZCZYK was the owner and operator of KP Consulting, a/k/a KP Pharmaceutical Consulting, Inc., a/k/a KP Pharmaceutical Services, Inc. (“KP”), located at 102 Pickering Way, Suite 200, Exton, Pennsylvania. KP offered consulting and recruiting services for the pharmaceutical and biotech industry by placing temporary and permanent employees with a specific expertise in the quality compliance and regulatory validation sector with clients in the pharmaceutical and biotech industry. Defendant ALESZCZYK was also the owner and operator of E &W Services LLC, a/k/a E & W Services (“E&W”), also located at 102 Pickering Way, Suite 200, Exton, Pennsylvania, with a second address of 760 North Pottstown Pike, Exton, Pennsylvania, which also provided consulting services. Defendant ALESZCZYK maintained bank accounts at Penn Liberty Bank and

Manufacturers & Traders Trust Company (“M & T Bank”), both in the Eastern District of Pennsylvania, for his businesses.

2. Company No. 1 was a pharmaceutical company with its main office and a research and development facility in Gaithersburg, Maryland.

3. Company No. 2, located in Mount Laurel, New Jersey, placed individuals in temporary, permanent, and contract assignments. Company No. 2 held a bank account at TD Bank in New Jersey. Company No. 2 entered into a business relationship with defendant PETER EDWARD ALESZCZYK and KP in which Company No. 2 agreed to provided funds to KP for KP to pay the payroll of temporary employees placed by KP with Company No. 1. KP agreed with Company No. 2 to bill Company No. 1 for the services of the temporary employees placed by KP with Company No. 1 at a cost higher than that of the actual temporary employee payroll and share the resulting profit between KP and Company No. 2.

#### **THE SCHEME**

4. From on or about September 30, 2008 to on or about February 11, 2009, defendant

**PETER EDWARD ALESZCZYK,  
a/k/a “Peter Alex,”**

devised and intended to devise a scheme to defraud and to obtain money and property of approximately \$560,629.76 from Company No. 2 by means of false and fraudulent pretenses, representations, and promises.

#### **MANNER AND MEANS**

It was part of the scheme that:

5. Defendant PETER EDWARD ALESZCZYK, on behalf of KP, falsely represented to Company No. 2 that temporary employees had been placed with Company No. 1 and that funds were needed from Company No. 2 to pay the payroll of the temporary employees placed by KP with Company No.1, when, in fact, the temporary employees had not been placed with Company No. 1. The false representations caused Company No. 2 to transfer funds in approximately thirty transactions totaling approximately \$560,629.76 by checks drawn from its account at TD Bank in New Jersey that were then placed in the United States mail and wire transfers from Company No. 2, using its TD Bank account in New Jersey, to defendant ALESZCZYK and KP and/or others for the benefit of defendant ALESZCZYK and KP in the Eastern District of Pennsylvania and elsewhere as follows:

<u>DATE</u>	<u>AMOUNT</u>	<u>METHOD OF TRANSFER OF FUNDS</u>
9/30/2008	\$19,695.00	Wire
9/30/2008	\$17,480.00	Wire
9/30/2008	\$15,268.50	Wire
10/01/2008	\$10,370.00	Wire
10/02/2008	\$17,595.00	Wire
10/02/2008	\$24,308	Mail
10/09/2008	\$16,133.01	Mail
10/10/2008	\$7,800.00	Wire
10/10/2008	\$5,462.50	Wire
10/10/2008	\$5,655.00	Wire
10/10/2008	\$5,865.00	Wire

10/16/2008	\$7,800.00	Wire
10/16/2008	\$5,462.50	Wire
10/16/2008	\$5,655.00	Wire
10/16/2008	\$5,865.00	Wire
10/17/2008	\$20,217.89	Mail
10/23/2008	\$500	Mail
10/23/2008	\$8,060.00	Wire
10/23/2008	\$5,462.50	Wire
10/23/2008	\$5,843.50	Wire
10/23/2008	\$6,210.00	Wire
10/24/2008	\$20,116.63	Mail
11/04/2008	\$45,382.88	Wire
11/7/2008	\$43,988.64	Mail
11/14/2008	\$43,779.00	Mail
11/21/2008	\$43,090.76	Mail
11/26/2008	\$42,977.75	Mail
12/08/2008	\$22,906.06	Mail
12/11/2008	\$40,884.01	Mail
12/18/2008	\$40,795.63	Mail

6. Defendant PETER EDWARD ALESZCZYK used these funds to enrich himself and to pay individuals to whom defendant ALESZCZYK owed money from past debts while defendant ALESZCZYK had caused Company No. 2 to falsely believe that these funds

were being used to pay temporary employees placed by defendant and KP at Company No. 1 pursuant to the contractual agreement between KP and Company No. 2.

7. Defendant PETER EDWARD ALESZCZYK falsely claimed to Company No. 2 that he was in contact with a specific individual at Company No. 1 and defendant ALESZCZYK falsely created email messages between himself and Company No. 1 to show that temporary employees had been placed by KP with Company No.1, when, in fact, such temporary employees had not been placed with and did not work at Company No. 1. Defendant ALESZCZYK also purchased an internet domain name similar to the name of Company No.1 and established email addresses using this domain to make it falsely appear that the temporary employees that defendant had claimed to have been placed with Company No. 1 actually worked at Company No. 1, when, in fact, the temporary employees did not work at Company No. 1.

8. On or about November 4, 2008, in Exton, in the Eastern District of Pennsylvania and elsewhere, defendant

**PETER EDWARD ALESZCZYK,  
a/k/a “Peter Alex,”**

for the purpose of executing the scheme described above, and attempting to do so, knowingly caused to be delivered by means of wire communication in interstate commerce from New Jersey to the Eastern District of Pennsylvania, approximately \$45,382.88 by wire transfer using TD Bank in New Jersey and the Federal Reserve Bank in Philadelphia, Pennsylvania.

In violation of Title 18, United States Code, Section 1343.

**COUNT TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 7 of Count One are incorporated here.
2. On or about December 18, 2008, in Exton, in the Eastern District of Pennsylvania and elsewhere, defendant

**PETER EDWARD ALESZCZYK,  
a/k/a “Peter Alex,”**

for the purpose of executing the scheme described above, and attempting to do so, knowingly caused to be delivered from New Jersey by United States mail, according to the directions thereon, a check in the amount of \$40,795.63 drawn on the Company No. 2 bank account at TD Bank to E & W Services LLC, 102 Pickering Way, Suite 200, Exton, PA 19341.

In violation of Title 18, United States Code, Section 1341.

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**LAURIE MAGID**  
**United States Attorney**